

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Civil No. 17-cv-2064 (JNE/HB)
)	
MINNESOTA SURETY AND TRUST)	
COMPANY and MIKE ROTHMAN,)	Judge Joan N. Ericksen
Commissioner of the Minnesota Department)	Mag. Judge Hildy Bowbeer
of Commerce, in his capacity as Liquidator)	
of Minnesota Surety and Trust Company,)	
)	
Defendants.)	
)	

UNITED STATES’ MOTION FOR JUDGMENT ON THE PLEADINGS

Pursuant to FED. R. CIV. P. 12(c), the United States, through the U.S. Department of Justice and on behalf of the U.S. Department of Homeland Security (“DHS”) and one of its components, U.S. Immigration and Customs Enforcement (“ICE”) (together, the “United States”), respectfully requests that this Court enter judgment on the pleadings and declare that Minnesota Surety and Trust Company (“MS&T”) became liable as surety on 62 ICE immigration bonds (“Bond(s)”) when the Bonds were executed.

This motion is based upon the Complaint, Dkt. 1, and Answer, Dkt. 10. The United States also submits a notice of hearing, memorandum of law, meet-and-confer statement, proposed order and certificate of compliance with word limits herewith.

Dated: August 15, 2017

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ATTORNEYS FOR THE UNITED
STATES

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 15, 2017, I electronically filed the foregoing UNITED STATES' MOTION FOR JUDGMENT ON THE PLEADINGS with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants.

/s/ Marc S. Sacks
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